

March 14, 2019

Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Patrick Prescott, KC1AJT  
314 Maple Street  
Bellingham, MA 02019

It is my firm belief that the Petition for Rulemaking RM-11828, filed by the ARRL would demonstrate a complete failure of the incentive-based licensing model of the amateur radio service. The original intention of the current licensing model was to encourage technician licensees to learn through experience, study radio theory and the associated laws, and then pursue a higher license class if they so wish.

In their proposal, the ARRL cites that approximately 50% of all amateur radio licensees in the United States hold a technician class license. I would not say this warrants a modification of the carefully-constructed licensing model. If the ARRL does, in fact, wish to grant more of these licensees additional privileges they should focus their efforts on outreach and education.

If this filing proceeds, the question of current licensees comes into concern. The current technician exam, and those of past years, does not sufficiently evaluate applicants on their skills and knowledge of the high frequency amateur radio bands. Given this, we cannot be confident that suddenly granting close to 400,000 operators HF privileges will not have ill effects on the self-policed HF amateur radio bands.

Since roughly 50% of all licensees are technician class, we can conclude that the current incentive-based licensing model is working as intended. If a licensee wishes to explore higher privileges, there is currently nothing preventing them from studying for the exam to upgrade to a general class license. If they do not wish to upgrade, there is nothing wrong with remaining at a technician class license.

I appreciate The Commission's time on this matter and look forward to a professional determination based on this petition.

Respectfully,

Patrick Prescott, KC1AJT